

TRAVEL, MEETINGS/COMMUNICATIONS

Jennifer and Phil have participated in numerous meetings with claims adjusters, engineers, fire department personnel, fire investigators, building/code enforcement personnel, contractors, architects, public adjusters, attorneys, utility representatives, remediation/winterization company, real estate agents (for rentals). All in-person meetings took place in NJ, requiring Jennifer and Phil to travel from PA. Jennifer and Phil have also been required to travel from PA to NJ to allow many of the above individuals to gain access to the property and to accompany them while they inspected the property.

QUANTIFICATION OF DAMAGES

Jennifer and Phil were required to inspect the property and its contents multiple times post-fire to provide detailed accountings of the losses sustained. Jennifer and Phil were required to provide a detailed accounting of the entirety of contents in the house. Photos of items (pre and post fire), price comparisons, receipts/proof of purchase were required by the insurance company for each and every item claimed as a loss. Jennifer and Phil used the house year-round and the house was filled with personal mementos, family photos, and beautiful home décor. Everything was destroyed. The final contents report consists of 168 pages (1,374 items). The first meeting with the contents adjuster was on 2/4/2020. Scottsdale required significant support concerning proof of valuation and condition of items. This was a monumental task. The final contents list is dated 6/16/2020 – four months after Jennifer and Phil started the contents valuation process. They estimate that they worked on the contents summary for 75-100 hours.

ENTERTAINING – HOLIDAYS AND FAMILY CELEBRATIONS

All family holiday and birthday celebrations were hosted at 60 Sunset Place. The majority of Jennifer's family live in Ocean City and Egg Harbor Township (15 minutes from OC), including Jennifer's parents, sister, nephews and Jennifer's 93 year-old grandmother with whom she is very close. Jennifer's parents are the primary caretakers of her grandmother and must stay with her at all times. After the fire, Jennifer was no longer able to host her family in Ocean City and her grandmother is unable to make the trip to PA. Jennifer and Phil have a 15 year-old dog and would have to find care for the dog in order to make the trip to NJ for various celebrations. This was not possible so Jennifer and Phil were unable to spend holidays/birthdays with her family from December 2019 through July 2021.

SUMMER GUESTS – Jennifer and Phil customarily hosted friends and family at 60 Sunset for extended stays throughout the summer. Jennifer and Phil were unable to host summer guests in 2020 and 2021.

RETRIEVING SALVAGED ITEMS

Jennifer and Phil rented a U-Haul van to transport items retrieved from 60 Sunset post-fire to Newtown, PA. This required a full day of travel, packing and unpacking.

MULTIPLE MOVES

Pleasure Avenue Rental (June 2020 to September 2020)

Jennifer and Phil moved into a summer rental at Pleasure Ave. Moving in and out both required a full day including travel. Jennifer and Phil were unable to store their boat at the Pleasure Avenue property so the boat remained in Newtown, PA and was not used during the summer of 2020. Most rental properties in

EXHIBIT "A"

Ocean City are not pet-friendly. The landlord included a surcharge for Jennifer and Phil's dog. Jennifer and Phil were required to thoroughly clean property prior to departure to ensure return of security deposit.

1517 West Ave. Rental (October 2020 to January 2021)

Jennifer and Phil moved into a rental at 1517 West Ave. in order to be local to supervise construction at 60 Sunset. Most rental properties in Ocean City are not pet-friendly and 1517 West was the only rental available at the time. The property was filthy and in poor condition with stained carpets. Jennifer and Phil purchased a new mattress because the existing one was stained and disgusting. Jennifer and Phil hired a woman to clean the property (she was there for 10 hours). Jennifer and Phil purchased slipcovers for the furniture. Jennifer and Phil ate most meals out because the kitchen was filthy and not equipped to cook meals. West Avenue is a main thoroughfare in OC and extremely noisy with truck traffic which affected sleep. Jennifer and Phil were required to clean property prior to departure.

Pictures of property available upon request.

60 Sunset

After the fire, Jennifer and Phil determined that they were unable to continue owning two homes due to Jennifer's complex post-traumatic stress disorder (CPTSD). Her symptoms of depression, anxiety and paranoia were significantly amplified by the fire and its aftermath. Jennifer has been treating with a therapist and is on medication. Jennifer and Phil sold their Newtown, PA home in May 2021 and moved to 60 Sunset full-time in July 2021.

They rented a U-Haul in July 2021 to move family heirlooms and breakable objects to 60 Sunset to avoid transportation by the moving company. The timing of the permanent move to 60 Sunset is a direct result of the fire and permanent relocation to 60 Sunset was not ever a consideration prior to the fire.

PERSONAL HARDSHIPS

Jennifer's best friend of 30 years passed away on January 18, 2020 – almost one month to the day after the December 19, 2019 fire. In the weeks after the fire, Jennifer was required to participate in multiple visits to NJ and meetings/inspections with various individuals related to the fire. Due to these obligations, Jennifer was unable to visit with her friend during her last days. Jennifer was emotionally overwhelmed.

Jennifer's 93 year-old grandmother moved permanently from PA to Ocean City, NJ in August 2019 to live in a condominium across the hall from Jennifer's parents, who are her primary caregivers. She has advanced dementia/Alzheimer's disease. The plan was that Jennifer would participate in the care of her grandmother and assist her parents as needed. Jennifer's parents are both employed and cannot watch her grandmother every day. After the fire in December 2019, Jennifer was unable to remain in Ocean City and participate in the care of her grandmother. Jennifer's parents hired caregivers to assist them since Jennifer was unable to.

CONSTRUCTION OF 60 SUNSET

Jennifer and Phil attempted to supervise construction at 60 Sunset which commenced in May 2020. They received multiple complaints from neighbors regarding noise, damage to personal property, dumpster issues (placement on street and loose debris) which required them to repeatedly intervene with their general contractor. After Jennifer and Phil's rental periods ended, they were no longer able to stay in OC

and monitor construction/progress at 60 Sunset. This proved to be disastrous. Jennifer and Phil subsequently discovered that their general contractor had no project manager and was rarely at the property to supervise construction. In addition, plumbing inspections were incomplete due to the contractor's failure to attend the inspection walk-through. This resulted in significant damage of the property; some of which has not yet been repaired.

Shower drain and underlayment was not inspected due to plumbing inspector's oversight. Inspector would not issue a C/O without inspection. Builder was required to gut shower, removing all tile for inspection of the shower bed. Shower was reconstructed while Jennifer and Phil were living at 60 Sunset full-time.

Days after moving to 60 Sunset in July 2021, Jennifer and Phil discovered a major leak in the home. The plumber failed to tie-in a condensate line from a top-floor HVAC unit. Water from the HVAC had been leaking into the walls for approximately 6 months. This resulted in an \$80,000 insurance claim against the plumber. The laundry room, powder room, garage and half of the kitchen were gutted and repaired. Significant mold remediation was required; Jennifer and Phil were unable to remain in home for hours while spray was applied. Repair commenced in July 2021 and was complete in September 2021 while Jennifer and Phil were living at 60 Sunset full-time.

Plumber failed to charge HVAC units which caused the temperature in the home to reach 90+ degrees. Hardwood flooring warped, millwork was damaged and trim paint was bubbled and peeled off throughout the home. All repairs were completed while Jennifer and Phil were living at 60 Sunset full-time.

Plumber also failed to install support under hall bath tub. Tub had to be removed along with entirety of tile shower enclosure and tile floor. This bathroom reconstruction is on-going and incomplete. This work was performed while Jennifer and Phil were living at 60 Sunset full-time.

Plumber installed a main drain line improperly which will require a significant portion of wall in the kitchen and laundry room to be removed; plumbing issue to be corrected and walls to be repaired. This repair has not yet commenced.

OBLIGATION TO PARTICIPATE IN SCOTTSDALE'S SUBROGATION LITIGATION

Jennifer and Phil are obligated to participate in Scottsdale's subrogation litigation. They have had numerous conversations with Scottsdale's lawyers to discuss claim and facts related to case. They are required to participate in depositions and trial, if the subrogation claim is not settled. This participation requires Jennifer and Phil to spend time and is also a trigger for Jennifer's CPTSD.

RE-SELECTION OF BUILDING MATERIALS, FURNISHINGS, ETC.

At the time of the fire, Jennifer and Phil had completed major renovations of 60 Sunset including bathrooms, flooring, roof, new furniture and interior painting. Mr. Siligato's scope of work (painting kitchen cabinet and installation of shiplap) was the final project to be performed at 60 Sunset. Jennifer and Phil had made all selections of building and construction materials and furniture. After the fire, Jennifer and Phil were required to re-select all building and construction materials, furniture, etc. This has been an unpleasant experience. Our former home was beautiful and newly renovated. We were very happy with the improvements and intended to remain in the property indefinitely. The fire has caused a

tremendous disruption in our lives and has been a traumatic experience rather than a joyful and exciting time which is customary when building a new home.

LOSS OF USE LIMITATIONS

Rental properties in OC are extremely inflated. The entirety of loss of use funds were expended on one summer/seasonal period. We were unable to enjoy the off-season in OC and were unable to supervise construction at the property. Our absence afforded the subcontractors the ability to perform sub-standard work which resulted in significant and on-going problems with the construction.

SUMMARY

Jennifer continues to suffer from paranoia and fear of another house fire. When Jennifer and Phil travel, a family member must stay in the home to reassure Jennifer that there are no problems at the house. Jennifer removes the knobs from the stove each time she leaves the house. Her medication prevents her from having panic attacks which she suffered from post-fire.

The fire at 60 Sunset has significantly affected Jennifer and Phil's lives in a profoundly negative way. There is no happiness and joy associated with the rebuild of the property or the move to Ocean City. It has been a nightmare at every turn and has put a tremendous strain on our lives. It has robbed us of peace. We have been forced to relive the events of December 19, 2019 repeatedly while cooperating in necessary investigations, insurance claim and legal processes. We watched the house burn in real time via video as the security cameras recorded the fire. It would be a monumental task to attempt to quantify the time we have lost due to Mr. Siligato's negligence.